



FEDERAL AVIATION ADMINISTRATION

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November 10, 1995

Federal Aviation Administration  
Office of the Chief Counsel, AGC-200  
Docket No. 28293  
800 Independence Avenue, SW  
Washington, D.C. 20591

Dear Sir or Madam:

The Helicopter Association International (HAI) is the professional trade association of more than 1,300 member organizations, which operate, manufacture or otherwise support the civil helicopter industry. HAI's members operate 4,000 civil helicopters, safely flying more than two million hours each year. The HAI is dedicated to promoting the helicopter as a safe, effective method of transportation, and to the advancement of the civil helicopter industry.

Although the HAI concurs in principle with the NPRM 95-12 we would like to offer the following comments:

The listed items in § 135.415(a)(1-10) could be interpreted to be major repairs as defined by FAR 43, Appendix A, and as such, are currently required to be reported to the FAA per §43.9(a)(4) and Appendix B. The new rule should not require the submission of both reports.

The clarification of the recordkeeping procedures and reporting processes of Structural Difficulty Reports (SDRs) will help curb needless duplication of records sent to the FAA from both operators and repair stations. The HAI supports any provisions that will expedite and increase the efficiency of the SDR process. The addition of the provisions allowing part 121, 125, 127, and 135 certificate holders to require the reporting of failures, malfunctions, or defects by repair stations will be helpful in reducing the amount of duplicate records sent to the FAA. Additionally, this will clarify the reporting responsibility of the regulation.

The HAI also supports the provisions for creating a central collection point for SDR's. Allowing SDRs to be processed in one location will increase the efficiency of the reporting process and make the retrieval of information easier for all parties involved.

Furthermore, HAI supports the FAA's attempts to modernize the reporting process by encouraging the submission of electronic data. The HAI has found, through our Maintenance Malfunction Information Reporting system (MMIR), that the use of electronic processing of FAA forms utilizes a mechanic's time more efficiently while providing clearer, more accurate data. The MMIR meets the FAA reporting requirements and allows the reporting agency, organization or mechanic to submit a Service Difficulty Report via a modem with the touch of a key.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank L. Jensen, Jr.", with a long horizontal flourish extending to the right.

Frank L. Jensen, Jr.  
President